

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CITGO PETROLEUM CORPORATION,

Plaintiff,

-against-

ASCOT UNDERWRITING LIMITED (FOR AND ON
BEHALF OF THE MEMBERS OF LLOYD'S SYNDICATE
1414), PIONEER UNDERWRITING LIMITED (FOR AND
ON BEHALF OF THE MEMBERS OF CONSORTIUM NO.
9146), MS AMLIN UNDERWRITING LIMITED (FOR AND
ON BEHALF OF THE MEMBERS OF LLOYD'S
SYNDICATE 2001), TRAVELERS SYNDICATE
MANAGEMENT LIMITED (FOR AND ON BEHALF OF
THE MEMBERS OF LLOYD'S SYNDICATE 5000), BRIT
SYNDICATES LIMITED (FOR AND ON BEHALF OF THE
MEMBERS OF LLOYD'S SYNDICATE 2987), SOMPO
INTERNATIONAL INSURANCE (FOR AND ON BEHALF
OF THE MEMBERS OF LLOYD'S SYNDICATE 5151),
CHAUCER SYNDICATES LIMITED (FOR AND ON
BEHALF OF THE MEMBERS OF LLOYD'S SYNDICATE
1084), MARKEL SYNDICATE MANAGEMENT LIMITED
(FOR AND ON BEHALF OF THE MEMBERS OF
LLOYD'S SYNDICATE 3000), NEON UNDERWRITING
LIMITED (FOR AND ON BEHALF OF THE MEMBERS OF
LLOYD'S SYNDICATE 2468), and STARSTONE
INSURANCE SE,

Defendants.

-----X

Case No. 1:21-cv-00389
(GHW) (SDA)

**RULE 7.1 CORPORATE
DISCLOSURE
STATEMENT**

Defendants Ascot Underwriting Limited (for and on behalf of the members of Lloyd's
Syndicate 1414), Pioneer Underwriting Limited (for and on behalf of the members of Lloyd's
Consortium No. 9146), MS Amlin Underwriting Limited (for and on behalf of the members of
Lloyd's Syndicate 2001), Travelers Syndicate Management Limited (for and on behalf of the
members of Lloyd's Syndicate 5000), Brit Syndicates Limited (for and on behalf of the members
of Lloyd's Syndicate 2987), Sompo International Insurance (for and on behalf of the members of

Lloyd's Syndicate 5151), Chaucer Syndicates Limited (for and on behalf of the members of Lloyd's Syndicate 1084), Markel Syndicate Management Limited (for and on behalf of the members of Lloyd's Syndicate 3000), Neon Underwriting Limited (for and on behalf of the members of Lloyd's Syndicate 2468), and Starstone Insurance SE (collectively, "**Defendants**"), by and through their attorneys, Clyde & Co US LLP, pursuant to Federal Rule of Civil Procedure 7.1 and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, state the following are parent corporations and publicly held corporations that own 10% or more of the stock of Defendants:

1. Syndicate 1414 is an unincorporated association, the managing agent of which is Ascot Underwriting Limited. The sole corporate member of Syndicate 1414 is Ascot Corporate Name Limited. Ascot Corporate Name Limited and Ascot Underwriting Limited are ultimately wholly owned subsidiaries of Ascot Underwriting Holdings Ltd.
2. Consortium No. 9146 is an unincorporated association, the managing agent of which is Pioneer Underwriting Limited, and which is comprised of Lloyd's Syndicate 1980 and Lloyd's Syndicate 2088. The sole corporate member of Syndicate 1980 is Liberty Corporate Capital Limited. The sole corporate member of Syndicate 2088 is China Re UK Limited. Liberty International Holdings Inc. is the immediate corporate parent of Liberty Corporate Capital Limited, and their ultimate parent corporation is Liberty Mutual Holding Company Inc. No publicly held corporations own 10% or more of the stock of Pioneer Underwriting Limited, Liberty Corporate Capital Limited or China Re UK Limited.
3. Syndicate 2001 is an unincorporated association, the managing agent of which is MS Amlin Underwriting Limited. The sole corporate member of Syndicate 2001 is MS

Amlin Corporate Member Limited. MS Amlin Corporate Member Limited and MS Amlin Underwriting Limited are ultimately wholly owned subsidiaries of MS Amlin plc, which is a wholly owned subsidiary of Mitsui Sumitomo Insurance Company, Limited, which is wholly owned by MS&AD Insurance Group Holdings, Inc., which is incorporated in Japan and listed on public stock exchanges.

4. Syndicate 5000 is an unincorporated association, the managing agent of which is Travelers Syndicate Management Limited. The sole corporate members of Syndicate 5000 are AprilGrange UK Ltd and F&G UK Underwriters Ltd., which are wholly owned subsidiaries of The Travelers Companies, Inc., a publicly held corporation.
5. Syndicate 2987 is an unincorporated association, the managing agent of which is Brit Syndicates Limited. The sole corporate member of Syndicate 2987 is Brit UW Limited. Brit UW Limited and Brit Syndicates Limited are indirect wholly owned subsidiaries of Brit Limited. Fairfax Financial Holdings Limited, a publicly held corporation, owns more than 10% of Brit Limited.
6. Syndicate 5151 is an unincorporated association, the managing agent of which is Sompo International Insurance. The sole corporate member of Syndicate 5151 is Endurance Corporate Capital Limited. Endurance Corporate Capital Limited is a wholly owned subsidiary of Endurance Holdings Limited.
7. Syndicate 1084 is an unincorporated association, the managing agent of which is Chaucer Syndicates Limited. The sole corporate member of Syndicate 1084 is Chaucer Corporate Capital (No. 3) Limited. Chaucer Corporate Capital (No. 3) is a wholly owned subsidiary of Chaucer Holdings, and their ultimate corporate parent is The Hanover Insurance Group Inc., a publicly held company.

8. Syndicate 3000 is an unincorporated association, the managing agent of which is Markel Syndicate Management Limited. The sole corporate member of Syndicate 3000 is Markel Capital Limited. Markel Capital Limited and Markel Syndicate Management Limited are wholly owned subsidiaries of Markel Corporation, a publicly held company.
9. Syndicate 2468 is an unincorporated association, the managing agent of which is Neon Underwriting Limited. The sole corporate members of Syndicate 2468 are Lavenham Underwriting Limited, Sampford Underwriting Limited and GAI Indemnity, Ltd. Lavenham Underwriting Limited, Sampford Underwriting Limited and Neon Underwriting Limited are wholly owned subsidiaries of Neon Capital Limited. GAI Indemnity, Ltd. and Neon Capital Limited are wholly owned subsidiaries of GAI Holding Bermuda Ltd.
10. Starstone Insurance SE is a Liechtensteiner corporation and is wholly owned by StarStone Bermuda Ltd.

Dated: New York, New York
April 13, 2021

CLYDE & CO US LLP

By: s/William M. Cooney
William M. Cooney

The Chrysler Building
405 Lexington Avenue, 16th Floor
New York, New York 10174
Tel: (212) 710-3900
Fax: (212) 710-3950
Email: william.cooney@clydeco.us

Attorneys for Defendants

